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 DEPARTMENT OF TRANSPORTATION
 and WILL KEMPTON, in his capacity as
 Director of the California Department of
 Transportation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR DISABILITY
 RIGHTS, INC. ("CDR"), CALIFORNIA
 COUNCIL OF THE BLIND ("CCB"),
 BEN ROCKWELL and DMITRI
 BELSER, on behalf of themselves, and on
 behalf of all others similarly situated,

Plaintiffs,

v.

CALIFORNIA DEPARTMENT OF
 TRANSPORTATION ("Caltrans") and WILL
 KEMPTON, in his official capacity.

Defendants.

Case No. C 06 5125 SBA (MEJ)

**STIPULATION AND REQUEST FOR
 EXTENSION OF TIME FOR
 PLAINTIFFS' RESPONSE TO
 SUPPLEMENTAL BRIEFING OF
 DEFENDANTS IN OPPOSITION TO
 PLAINTIFFS' FEE MOTION;
~~PROPOSED~~ ORDER**

1 On May 27, 2010, the Court held a hearing on the matter of Plaintiffs' Motion for
2 Attorney's Fees.

3 The Court ordered Defendants to submit supplemental briefing by June 11, 2010,
4 detailing their objections to Plaintiffs' time entries and the deductions sought, including their
5 objections to the media fees sought by Plaintiffs.

6 The Court ordered that Plaintiffs' response to such supplemental briefing be submitted by
7 June 18, 2010.

8 On June 11, 2010, at 11:21 p.m., and then on June 12, 2010, at 12:44 a.m., Defendants
9 filed supplemental briefing consisting of 16 pages of argument, a 138-page declaration, and
10 almost 900 pages of exhibits including "errata" regarding exhibits, detailing thousands of
11 objections to Plaintiffs' time entries.

12 Because of the volume and detail of Defendants' supplemental briefing, Plaintiffs are
13 unable to respond to Defendants' various types of objections by June 18, 2010, as the Court
14 previously ordered. *See* Declaration of Ronald Elsberry in Support of Stipulation and Request
15 for Extension of Time for Plaintiffs' Response to Supplemental Briefing of Defendants in
16 Opposition to Plaintiffs' Fee Motion, submitted herewith.

17 Neither party has previously sought an extension of time to file any briefing in
18 connection with the fee motion under consideration.

19 Plaintiffs' fee motion was originally set to be heard by Judge Armstrong on April 27,
20 2010, and Plaintiffs filed their motion including all supporting papers on March 23, 2010. When
21 Judge Armstrong referred the matter to this Court, the hearing was continued to May 13, 2010.
22 Defendants filed their initial opposition to the motion on April 22, 2010. Defendants also filed
23 "errata" to their opposition including, for the first time, Exhibits P and Q to the Declaration of
24 Gregory F. Hurley, on April 28, 2010. Plaintiffs filed their reply on April 29, 2010. This Court
25 subsequently further continued the hearing to May 27, 2010.

26 Judge Armstrong granted final approval of the parties' settlement on June 2, 2010,
27 acknowledging in her Order that "Plaintiffs' application for an award of attorneys' fees and
28

1 expenses has been submitted to the Court and referred to Magistrate Judge Maria Elena James
2 for determination, subject to review by this Court upon timely request by either party.”

3 There is no specific deadline for the determination of Plaintiffs’ fee motion.

4 The parties agree to a two-week extension for Plaintiffs to file their response to
5 Defendants’ supplemental briefing.

6 The undersigned parties, by and through their counsel of record, hereby stipulate to and
7 request that:

8 The Court order that Plaintiffs’ briefing in response to Defendants’ supplemental briefing
9 as ordered by the Court be extended two weeks to July 2, 2010.

10
11 SO STIPULATED.

12
13 DATED: June 14, 2010

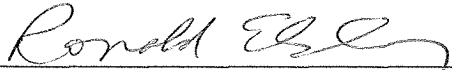
GREENBERG TRAURIG, LLP

14 _____
/s/*

15 Gregory F. Hurley
Attorneys for Defendants

16 DATED: June 14, 2010

DISABILITY RIGHTS ADVOCATES

17 
18 Ronald Elsberry
Attorneys for Plaintiffs

19 *The filer of this document attests that concurrence in the filing of this document has been
20 obtained from Defendants’ counsel.

21 ~~**(Proposed)**~~ ORDER

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23
24 Dated: June 16, 2010 _____


25 MARIA-ELENA JAMES
Chief United States Magistrate Judge

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